

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: Mukund	:	
	:	Art Unit: 3629
Serial No.: 09/682,713	:	
	:	Examiner: Jonathon P. Ouellette
Filed: October 9, 2001	:	
	:	
For: WEB BASED METHODS AND	:	
SYSTEMS FOR MANAGING	:	
COMPLIANCE ASSURANCE	:	
INFORMATION	:	

DECLARATION UNDER 37 C.F.R. §1.132

I, R. Mukund, a citizen of the United States of America, hereby declare and state:

1. I am currently employed by General Electric Company ("GE") as a General Manager for Gensuite Digitization and Compliance Systems.

2. GE is the assignee for the above-referenced patent application.

3. I have a Doctor of Philosophy (Ph.D.) in Environmental Engineering and Science, which was conferred upon me by the University of Illinois at Urbana-Champaign in 1989.

4. I have been employed by GE since 1997. While employed by GE, I have worked as a (1) Program Manager in EHS Compliance Assurance within GE Power Systems, (2) Master Black Belt for EHS in GE Power Systems, (3) Manager, Compliance Assurance IT Systems for GE Corporate Environmental Programs, prior to my current position. While employed by GE, my responsibilities have included implementation and management of compliance assurance processes across global business operations in businesses with individual annual revenues of \$1-25 billion, that rollup into the General Electric Company, with 2008 annual revenues of ~\$180B. I am currently responsible for managing information systems based on the one described in the above-referenced patent application that allow individual operations with each of GE's businesses to digitally conduct their compliance assurance process in a manner that allows local management oversight, as well as regional, and national managers rollups and reviews, and provides direct and transparent visibility of compliance status and rollup performance metrics to both business and corporate functional managers and senior management leaders.

5. I am the inventor of the above-referenced patent application. I am familiar with the method and computer system described in the present patent application.

6. I have read and understand the Office Action mailed March 4, 2009 in the present patent application, and U.S. Patent Application Pub. No. US 2002/0184068 A1 to Krishnan et al. (hereinafter referred to as "Krishnan") cited therein. I have reviewed all pending claims of the present patent application, including Claims 1-3, 5, 6, 8-18, 20, 23-36, and 38-45.

7. At least one of the limitations of the computer system described in Krishnan is that it is unable to store, track, and display information based on an organizational structure of a company. Most large companies have an organizational structure (e.g., regions, divisions, plants, departments, buildings, etc.). Different individuals employed by a large company may have responsibilities at the different organizational levels within the company. Thus, these individuals have a desire to review information relating to the company for the particular organizational levels they are responsible for. For example, a Plant Manager may be interested in company information at a plant level, whereas a Vice President may be interested in company information at a divisional level and at every level below the divisional level. The methods and systems described in the present patent application were created to address this problem by allowing users to display information at each level included within the organizational structure of the company – and not just at an executive level or a worker level. Because Krishnan does not allow a user to store, track and display information based on an organizational structure of a company, the Krishnan system could not address the problem resolved by the method and system described in the present patent application.

8. Krishnan does not describe creating within a centralized database a hierarchy of business units included within a business entity, wherein the hierarchy of business units includes at least a business entity level, an organization level, a site level, a department level and a building level, and wherein the organization level is a predefined sub-portion of the business entity level, the site level is a predefined sub-portion of the organization level, the department level is a predefined sub-portion of the site level, and the building level is another predefined sub-portion of the site level. Rather, Krishnan describes providing personnel levels (e.g., managers/executives, executive/policy makers, and worker) with a different desktop that includes different information and different options. (See paragraphs [0119]-[0133].) The personnel levels described by Krishnan are not analogous to the hierarchy of

business units described in the present patent application in that personnel levels are not predefined sub-portions of other personnel levels. For example, as is recited in the present patent application, a business entity may include at least one organization, an organization may include at least one site, and a site may include at least one department and/or at least one building. Conversely, a manager/executive does not include at least one worker, and an executive/policy maker does not include at least one worker, but rather, a worker is merely a subordinate of a manager/executive and a worker is merely a subordinate of an executive/policy maker.

9. Moreover, the personnel levels (e.g., managers/executives, executive/policy makers, and worker) described in Krishnan can only view information for a single company location or multiple user-entered locations. (See paragraphs [0120]-[0133].) Krishnan is completely silent as to organizing and displaying information based on a hierarchy of business units included within a business entity, wherein the hierarchy of business units includes at least a business entity level, an organization level, a site level, a department level and a building level, and wherein the organization level is a predefined sub-portion of the business entity level, the site level is a predefined sub-portion of the organization level, the department level is a predefined sub-portion of the site level, and the building level is another predefined sub-portion of the site level. Merely displaying information based on personnel level at a single company location or at multiple user-entered locations does not describe or teach the ability to display information at multiple levels within a business entity wherein each the levels are part of a pre-defined hierarchy of business units. I disagree with the assertion that the hierarchy of business units described in the present patent application is suggested by Krishnan.

10. Additionally, the creation of the hierarchy of business units facilitates storing compliance assurance ("CA") information and a plurality of predetermined audit checklists within the centralized database including organizing the stored CA information based on the hierarchy of business units such that CA information is retrievable and displayable by at least one of the business units included within the hierarchy of business units, wherein the CA information includes CA tasks to be performed and a responsible person assigned to each task at each business unit included within each level within the hierarchy of business units.

11. Because Krishnan does not describe or suggest creating a hierarchy of business units as is recited in the present patent application, Krishnan could not describe or

suggest storing CA information and a plurality of predetermined audit checklists within the centralized database including organizing the stored CA information based on the hierarchy of business units such that CA information is retrievable and displayable by at least one of the business units included within the hierarchy of business units, wherein the CA information includes CA tasks to be performed and a responsible person assigned to each task at each business unit included within each level within the hierarchy of business units. Rather, Krishnan describes assigning tasks that include a person responsible, a start date, a due day, and a function/department. (See paragraphs [0112]-[0115].) Notably, the person responsible described by Krishnan does not describe a responsible person assigned to a task at each business unit included within each level within the hierarchy of business units. For example, as is recited in the present patent application, a business entity may include a responsible person assigned to each task at an organization level, at a site level, at a department level, and at a building level.

12. Furthermore, the creation of the hierarchy of business units also facilitates providing CA information for a selected business unit including providing CA tasks and a responsible person assigned to each CA task for the selected business unit.

13. Because Krishnan does not describe or suggest creating a hierarchy of business units as is recited in the present patent application, Krishnan could not describe or suggest providing CA information for a selected business unit including providing CA tasks and a responsible person assigned to each CA task for the selected business unit. Rather, Krishnan describes showing a risk management report for either a selected site or all facilities. (See paragraphs [0125]-[0126]; see also Figure 14.) Notably, Krishnan does not describe or suggest selecting a business unit and displaying a plurality of locations associated with the selected business unit.

14. In order to resolve the problem that is not even addressed by Krishnan, I invented the method and computer system described in the present patent application to allow a user to store, track, and display information based on an organizational hierarchy of business units included within a business entity.

15. GE has used the method and system described in the present patent application for at least seven years.

16. GE has licensed computer systems that are similar to the method and system described in the present patent application to at least three entities, and is in negotiations with at least four other entities.

17. It is my opinion the method and system described in the present patent application satisfy a need that is not addressed by the Krishnan system, and thus, entities such as GE and entities other than GE are looking to this computer system to resolve this need.

18. I hereby declare that all statements made herein of my own knowledge are true, and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine and/or imprisonment under Section 1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the application or any patent issuing therefrom.

Date: 18-June-2009



R. Mukund